
From: "Parsons, Jeffrey" <BMP/HOUSTON/RECIPIENTS/JPARSONS>
Sent: 7/15/2016 4:26:02 PM +0000
To: "Judge, Jonathan" <jjudge@schiffhardin.com>
Subject: RE: Hinson - post-trial options memo

Jon,

Is there someone else at your firm who is equally knowledgeable about the evidence at trial? If so, I'd like to speak with him or her - or with you later this afternoon.

From my review of the transcripts thus far, I cannot find any evidence offered by plaintiff to support the proposition that the seat was unreasonably dangerous to use without a warning that it should not be used by children under 2. The only evidence I can find that gets close is the American Pediatric Academy's recommendation that children under 2 should be seated rear facing because it is "five times safer" - which is not the same as saying that front facing seating under 2 is "unreasonably dangerous".

Thus, I am wondering whether Plaintiff actually met its burden of proof or whether there is insufficient evidence to support the jury's verdict.

Jeff

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From: Judge, Jonathan [mailto:jjudge@schiffhardin.com]
Sent: Friday, July 15, 2016 10:51 AM
To: Parsons, Jeffrey
Subject: RE: Hinson - post-trial options memo

Jeff,

I am in a deposition that may go all day and my phone is having a screen issue. The upshot is that I may be difficult to reach this afternoon unfortunately. I apologize. I can certainly let you know as soon as my deposition is out and I will immediately make myself available, technology willing.

Jonathan

From: Parsons, Jeffrey
Sent: Friday, July 15, 2016 11:01 AM
To: Judge, Jonathan

Exhibit A-9

IRONSHORE0004199

Subject: RE: Hinson – post-trial options memo

Jon,

Please let me know your availability for a call this afternoon.

Jeff

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From: Judge, Jonathan [<mailto:jjudge@schiffhardin.com>]
Sent: Thursday, July 14, 2016 7:30 PM
To: Parsons, Jeffrey
Subject: Hinson – post-trial options memo
Importance: High

Jeff,

With my thanks for your patience, here is our short memo listing the highest-priority issues and primary cases / exhibits / testimony addressing them.

We haven't had a chance to incorporate your ideas on causation, but we'd like to do so before filing any motions.

Jonathan

Jonathan Judge
Partner

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